

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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January 3, 2022

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
Remedial Project Manager  
Institutional Controls Coordinator  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 64 (October-December 2021)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from October-December 2021.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the October-December 2021 period, the Group continued to perform title searches for use with 10 draft environmental covenants, including the draft environmental covenants for the 1555 State Street property; the Unknown Road (Taracorp) property; the Scott Oney property; the Oney-Shrum property; the Taracorp pile property; the Mayco (Illinois), LLC property; the Terminal Railroad Association property; the U.S. Carriers Inc. property; the Transload Realty property; and the Brenda Ervin property.
- **Remote Fill Properties:** The Group's project coordinator discussed the draft Scope of Work for Soil Sampling on Remote Fill Properties with EPA and Illinois EPA representatives during conference calls on October 27 and December 9, 2021.
- **Petition for Partial Deletion from the National Priorities List (“Petition”):** The Group's project coordinator discussed the status of EPA's work related to the Group's Petition with EPA and Illinois EPA representatives during conference calls on October 27 and December 9, 2021.
- **Operation and Maintenance:** During the October-December 2021 period, the Group's project coordinator continued to prepare a revised Operation and Maintenance Plan to update the Group's 2002 Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site:

October 1	The Group's lawn maintenance contractor, Munie Greencare Professionals ("Munie"), cut the vegetation on the 1555 State Street property at the Main Industrial Site.
October 4	Munie completed mowing work at the Main Industrial Site that had been initiated on October 1.
October 18	The Group's project coordinator sent an email to Munie regarding the status of Munie's work at the site.
October 19	Munie cut the vegetation along the State Street sidewalk and fence.
November 1	Munie cut the vegetation along the State Street sidewalk and fence.
November 12	Munie cut the vegetation on the Taracorp pile cap, the 1555 State Street property, and the areas along the State Street sidewalk.

- **Project Coordination:** During the October-December 2021 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

October 5	Submitted Quarterly Progress Report 63 to EPA.
October 25	Sent an email to EPA's project manager to propose a schedule for the 2021 annual site visit.
October 26	Spoke to the City of Venice's attorney in regard to the draft roadways ordinance for Venice.
October 27	Participated in a conference call with EPA and Illinois EPA regarding the status of work at the site.
November 12	Sent an email to EPA's project manager to confirm that the Group planned to address EPA's comments on the draft Scope of Work for Soil Sampling on Remote Fill Properties, upon receipt.
November 15	Performed a semi-annual operation and maintenance inspection at the site.
November 16	Participated with Illinois EPA in an annual site visit.
November 1	Finalized the schedule with EPA and Illinois EPA for the annual site visit on November 17, 2021.
November 17-23	Communicated with Munie's representatives regarding the groundhog holes along the sideslopes of the Taracorp pile cap.
November 23	Sent an email to the owner/operator of All Pallet Services to request that the bent section of fence along the southwestern side of the Taracorp pile be repaired.
November 30	Sent an email and letter to EPA and Illinois EPA to provide log sheets and photographs documenting the results of the November 16-17, 2021 semi-annual operation and maintenance inspection and annual inspection.

December 9	Received a copy of an email that EPA's project manager sent to the City of Venice's attorney to inquire about the status of the draft roadways ordinance for Venice.
December 9	Participated in a conference call with EPA and Illinois EPA regarding the results of the annual site inspection and the status of work at the site.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- Not applicable for this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. As part of those activities, the Group will continue to prepare an updated operation and maintenance plan.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile. In addition, the Group will follow-up with All Pallet Services regarding the status of its efforts to repair the fence.
- The Group will address comments or questions, if any are received from EPA, on the draft Scope of Work for Soil Sampling on Remote Fill Properties.
- The Group will continue to perform title searches, as part of efforts to finalize environmental covenants. Upon completion of title searches, the Group will prepare lists of encumbrances for inclusion in the environmental covenants and initiate efforts with property owners.
- The Group will address comments and questions, if any are received from EPA, on the Petition, which was submitted to EPA in March 2021.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019 and October 2020.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.

- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (1011 McCambridge, 1121 Reynolds, and 2222 Edison) in June 2015 and one residential property (2112 Missouri Avenue) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (1314 Iowa, 1743 Olive, and 1723 Edison) in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,  
**MONTROSE**



Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath – Illinois EPA (by electronic mail and first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)